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**STATES DISTRICT COURT
DISTRICT OF NEVADA**

ROBERT FLORES, an individual,

Plaintiff,

vs.

WAL-MART STORES, INC., a foreign
corporation d/b/a Wal-Mart Neighborhood
Market #3355; JONATHAN SOROLA, an
individual; DOES 1 through 10, inclusive; ROE
CORPORATIONS 11 through 20, inclusive; and
ABC LIMITED LIABILITY COMPANIES 21
through 30, inclusive,

Defendant(s).

CASE NO.: 2:17-cv-01991-JAD-NJK

**STIPULATION TO EXTEND
DISCOVERY DEADLINES (FIRST
REQUEST)**

Plaintiff, Robert Flores (“Plaintiff”), by and through his counsels of record, Brian D. Nettles, Esq. Christian M. Morris, Esq., and Edward J. Wynder, Esq., of Nettles Law Firm, and Defendant, Wal-Mart Stores, Inc. d/b/a Wal-Mart Neighborhood Market #3355 (“Defendant”), by and through its counsel of record, Timothy D. Kuhls, Esq., Esq., of Phillips, Spallas & Angstadt, LLC, hereby stipulate to the extension of all remaining discovery deadlines by sixty (60) days pursuant to LR 26-4.

STIPULATED APPLICATION

WHEREAS, the parties have begun discovery but still have substantial discovery to complete before they will be ready for trial, the parties request a sixty (60) day extension of certain discovery deadlines as set forth below.

A. DISCOVERY COMPLETED TO DATE

1. The parties participated in the Fed. R. Civ. P 26(f) conference on August 15, 2017.
2. Plaintiff made his pre-discovery disclosures pursuant to Fed. R. Civ. P 26.1(a)(1) on August 28, 2017. Defendant served its pre-discovery disclosures pursuant to Fed. R. Civ. P. 26.1(a)(1) on September 15, 2017.
3. Defendant propounded written discovery to Plaintiff on September 18, 2017 and Plaintiff responded to Requests for Admissions on October 11, 2017 and Requests for Production of Documents on October 16, 2017 and Interrogatories on October 16, 2017.
4. Plaintiff propounded written discovery to Defendant on November 1, 2017.

B. SPECIFIC DESCRIPTION OF THE DISCOVERY TO BE COMPLETED

Plaintiff has been unable to designate a medical expert or produce a report due to scheduling conflicts of the expert. Defendant's responses to Plaintiff's written discovery is due December 1, 2017. The parties have conducted one deposition of Defendant's girlfriend, the deposition of one of Defendant's employees is currently scheduled. The parties intend to depose several individuals including Plaintiff, Defendant's Rule 30(b)(6) designee(s), treating medical professionals, expert witnesses and other employees of Defendant.

C. REASONS FOR EXTENSION TO COMPLETE DISCOVERY

Despite the good faith efforts of the parties to comply with the Court's discovery deadlines, various scheduling conflicts have occurred. As set forth above, Plaintiff has experienced a delay in producing a medical expert report due to the scheduling conflicts of the medical expert. Accordingly, the parties believe a sixty (60) day extension to discovery is warranted and prudent. This request is made in good faith and not for the purpose of delay.

D. PROPOSED NEW DISCOVERY PLAN DEADLINES

Last date to complete discovery:

Currently: Friday, February 9, 2018

Proposed: Tuesday, April 10, 2018

Last date to amend pleadings and add parties:

Currently: Friday, November 10, 2017

Proposed: Tuesday, January 9, 2018

Last date to disclose experts pursuant to Fed. R. Civ. P. 26(a)(2):

Currently: Monday, December 11, 2017

Proposed: Friday, February 9, 2018

Last date to disclose rebuttal experts:

Currently: Wednesday, January 10, 2018

Proposed: Monday, March 12, 2018

Last date to file interim status report:

Currently: Monday, December 11, 2017

Proposed: Friday, February 9, 2018

Last date to file dispositive motions:

Currently: Friday, March 9, 2018

Proposed: Tuesday, May 8, 2018

Last date to file joint pretrial order:

Currently: Friday, April 6, 2018

Proposed: Tuesday, June 5, 2018

CONCLUSION

Therefore, based upon the foregoing, the parties respectfully request that this Stipulation to Extend Discovery (First Request) be granted and that the Court adopt the proposed dates mentioned above.

DATED this 9th day of November, 2017.

DATED this 9th day of November, 2017.

NETTLES LAW FIRM

PHILLIPS, SPALLAS & ANGSTADT LLC

/s/ Christian M. Morris, Esq.

/s/ Timothy D. Kuhls, Esq.

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Attorneys for Plaintiff

Case Name: Flores v. Wal-Mart Stores, Inc.

Case Number: 2:17-cv-01991-JAD-NJK

IT IS SO ORDERED:

Dated: November 13, 2017


UNITED STATES MAGISTRATE JUDGE